

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-  
cv-14176-ADB

Leave to File Granted  
August 7, 2015 (Dkt.  
93)

**DECLARATION OF PATRICK STRAWBRIDGE**

Patrick Strawbridge, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am an individual over twenty-one years of age, and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and am fully competent to declare as to matters stated herein.

2. I am an attorney for the Plaintiff in this action, Students for Fair Admissions, Inc. (“SFFA”).

3. I make this Declaration in connection with the motion to compel the production of certain documents that SFFA has requested from Defendant President and Fellows of Harvard College (Harvard Corporation) (“Harvard”).

4. Attached hereto as Exhibit A is a true and correct copy of an email exchange I had with counsel for Harvard, renewing SFFA’s request that Harvard provide information about its database so SFFA could determine the merit of Harvard’s claim that the database was sufficient for its expert analysis.

5. In follow up phone conversations, I made clear to Ms. Ellsworth that SFFA was willing to review this material, and that if provided it may permit SFFA to table the pending request for application files. Ms. Ellsworth indicated that her client would not produce any documents or information pending a decision on the motion to stay.

6. Attached hereto as Exhibit B is a true and correct copy of an excerpt from relevant portions of the transcript of the deposition of Marlyn E. McGrath, Harvard's Director of Admissions, taken on June 18, 2015. Names of individual admissions officers have been redacted pursuant to Harvard's request under the Stipulated Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, August 6, 2015.

/s/ Patrick Strawbridge

Patrick Strawbridge